

Gary Eugene Maddox Jr
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apartment 1
Pro se

In the United States District Court for Baltimore city, Annapolis
In the state of Maryland

Gary Eugene Maddox Jr.

Case no:

Jury Demand

Vs.

The parole commission of Maryland and its agents.

Chairman David R Blumberg
Agent DeAngelo Patterson
Agent Robin D Hall

Complaint:

18 U.S Code § 1621 Perjury generally
4th amendment

14th amendment

18 U.S code § 242-Deprivation of
rights under the color of law
Relief prayed for in the amount of \$250,000

I Gary Maddox present under oath that In a civil case/judicial review.

chairman David R Blumberg of the parole commission of Maryland did unlawfully commit perjury In the circuit Court for Baltimore city in a sworn affidavit (Exhibit 2) that chairman Bloomberg entered About A recorded phone conversation (Exhibit 1) that Chairman Blumberg and Gary Maddox had. this recording was entered into the circuit court of Baltimore in a judicial review and in a writ of mandamus (Exhibit 20) In the recording chairman Blumberg clearly

states “Gary Maddox was not released with any special conditions from the “parole commission” or the sentencing judge.” in and attempt to re-create and explain this recorded conversation for the circuit court of Baltimore chairman Bloomberg entered in an affidavit stating The total opposite. that“ Gary Maddox was released with special conditions” knowing the said statement wasn’t true and that there was a recording of the original Conversation. chairman Bloomberg purposefully did this to cover up the reason for the parole commission issuing several sex offender warrants without probable cause (Exhibit 3,4,5) for Gary Maddox even though Gary Maddox is not a sex offender and does not have sex offense charges. Both the recording and affidavit (Exhibit 1,2) were entered into the lower court in a writ of mandamus complaint and in a judicial review. civil court judge Nugent dismissed both cases (Exhibit 6,12) even though Judge Nugent is not an administrative law judge he is a civil court judge. but yet and still judge Nugent chose to dismiss Gary Maddox’s judicial review. (Exhibit 13)

and the special Court of Appeals of Annapolis Maryland chose not to rule on the charges For chairman David r Blumberg ,d’Angelo Patterson and Robin D Hall.(Exhibit 29.)

Parole Agent DeAngelo Patterson did unlawfully violate mr. Maddox’s 4th and 14th amendment by placing a GPS monitor on mr. Maddox unlawfully detaining

and tracking mr. Maddox's whereabouts Approximately from June 2022 up until October 2022 without permission from The parole commission of Maryland and when questioned about this under oath in the recorded impartial tribunal by his superior Commissioner Miller at one hour and thirty minutes into the recording (Exhibit 1. recording from 11/2/2021) Commissioner Miller can be heard stating to DeAngelo Patterson on record that she would not state that anyone gave him permission from the parole commission to Place Mr. Maddox on GPS monitoring. (Exhibit 1. recording from 11/2/2021) commissioner Miller made this clear several times on record. Commissioner Miller also stated that deAngelo Patterson violated Mr. Maddox's fourth amendment privacy right and that he did not give mr Maddox his right of due process (14th Amendment) by not entering any documents pertaining to This matter and by placing a GPS monitor on Gary Maddox without presenting a reason to the parole board or to Gary Maddox For doing so.

In the recording of the impartial tribunal on November 2, 2021 while under oath D'Angelo Patterson states that " a commissioner did give him permission to place Gary Maddox on GPS monitoring" and then his superior Commissioner Miller corrected Agent Patterson on record by not aiding Mr. Patterson in his Lie. Commissioner Miller clearly repeated for the record that she would not state that The parole commission gave DeAngelo Patterson permission for the GPS monitoring of Mr. Maddox. Commissioner Miller also stated That D'Angelo

Patterson alleged that a parole commissioner gave him permission and then Commissioner Miller also stated that She proved that to be false. She also stated “that commissioner cluster and no one from the parole commission at any time gave permission to D’Angelo Patterson for the GPS monitoring of Mr Maddox. commissioner Miller in a fair manner secured these statements to the record on November 2, 2022.(Exhibit 1. recording from 11/2/2021) .

Agent deAngelo Patterson did unlawfully commit perjury in an impartial tribunal by stating that a commissioner gave him permission to place a GPS monitor on Mr Maddox.(Exhibit 1 Recording from 11/2/2021)

Commissioner Miller also made D’Angelo Patterson remove the GPS tracking from Gary Maddox because the maximum amount of days is 120 days when done in a lawful manner but Mr. Maddox was on the GPS monitoring for five months unlawfully (Exhibit 1 Recording from 11/2/2021) Maddox was also ordered by D’Angelo Patterson to report his whereabouts in detail to agent D’Angelo Patterson.

Parole agent Robin D Hall did violate Mr. Maddox’s 4th and 14th amendment by placing GPS monitoring on Mr. Maddox tracking his whereabouts without permission from the parole commission and without documenting a reason for doing so. or presenting Mr. Maddox with a reason for doing so.

The unlawful tracking of Mr. Maddox occurred from 9/6/21 up until 10/16/2020
(Exhibit's 10,11)

The parole commission of Maryland did unlawfully Violate Gary Maddox's fourth amendment right by issuing several sex offender warrants without probable cause (Exhibits 3, 4, 5) Because Mr. Maddox has never been convicted of a sex offense. The first warrant was issued by The parole commission of Maryland and executed by the Rappahannock police department of Virginia (Exhibit 4) which is a third-party in which this warrant was shown to. and these warrants can be seen when running a BCI here in Maryland which causes a Confusion when trying to gain employment because they run a background check and can see that Gary Maddox has been arrested for sex offender warrants but also that Mr Maddox is not on the sex offender registry Which is very confusing and hard to explain to employment.

The 4th amendment states that no warrants shall issue without probable cause and the parole commission has repeatedly stated on record in the impartial tribunal on November 2, 2022 that they fully acknowledge The fact that Gary Maddox does not have any sex offense charges but ultimately still allowing these unlawful sex offender warrants to be issued without probable cause for Maddox's arrest. After being placed in jail twice Over a two-year period for the issuing of these unlawful sex offender warrants. (Exhibits 3,5)

on March 3, 2021 in the recorded impartial tribunal. the parole commission of Maryland ordered Mr. Maddox to undergo sex offender assessment and treatment.

On June 27, 2022 Maddox recorded the assessment at the halyard Center with permission .(Exhibit 1.Recording of sex offender assessment) Mr. Maddox Continued The sex offender's assessment at the halyard sex offenders Health and wellness Center after they conducted a two-part assessment and extensively looked into Gary Maddox's background. Gary Maddox returned for the second part of the assessment on July 1st Where Dr. Tashica halyard deemed Mr. Maddox not to be a sex Offender.

.(Exhibit 1, Recording of assessment and also exhibit 17 the entered documents in a special Court of Appeals)

despite the fact that Mr. Maddox went to a doctor of the parole commission's choice and was deemed not to be a sex offender.

mr. Maddox still remains under the supervision of the commets sex offenders division of maryland. prior to this Mr Maddox entered in a stop agency order/judicial review to stop this order. (Exhibit 6) the circuit court returned a letter to Mr Maddox stating that the circuit court of Baltimore does not handle judicial reviews. (Exhibit 16)

Although. at the end of each impartial tribunal's recording the officer/commissioner clearly states "to appeal this decision you must appeal

through the circuit court of Baltimore" (Exhibit 6 and Exhibit 1 Recording from 3/3/2022) and it is also stated at the bottom of the judicial review receipt That Maddox received. (Exhibit 15)

Under the color of law All of these officers played a part in depriving Mr. Maddox of his constitutional rights intentionally solely for the purpose of causing Mr Maddox harm. The sex offender commets division specializes in sex offense charges so they fully understood what they were doing to Mr. Maddox purposefully

In Conclusion

for the forgoing reasons

Respectfully. I Gary maddox request that A law be created or Amended so that the Parole Commission of Maryland Can only govern over a person for that which he or she has been convicted of. and any procedures which support that.

And also that chairman Blumberg be held accountable for perjury and misconduct in office and that Agent D'Angelo Patterson and Agent Robin D Hall be held accountable for unlawful detainment and the violation of mr. Maddox's 4th Amendment right of privacy and also Mr. Maddox's 14th Amendment right of due process for This vicious and unwarranted violation of Mr. Maddox's constitutional rights mr Maddox also seeks relief in the amount of \$250,000 for the issuance of the unlawful warrants which stopped Maddox from gaining employment over a

two year period. The special Court of Appeals did not rule on the constitutional laws that were broken by these agents of the law and ultimately left Maddox in harms way on the sex offender's commitment's division for this to continue happening. even though Maddox entered the information from The sex offender assessment (Exhibit 17) which deemed Gary Maddox not to be a sex offender. this was entered into the special Court of Appeals case before Maddox received a deliberation which can be seen in the postal mail stamp from the special court of Appeals on July 12th (Exhibit 18) and from Maddox's postal receipt which shows the departure 7/6/22 and arrival 7/7/22 of the sex offender assessment information to The special court of Appeals (Exhibit 19)

Respectfully submitted

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